

Trinidad vs. Wiseman
Civil no. 08-0004
Paralegal's Time

DATE	STAFF	T/E	DESCRIPTION	DUR/QTY	AMOUNT
2/1/2008	Phyllis Ain	Exp.	Review history of Pangelinan filings, Court Orders and sanctions. Review Complaint. Prepare statement of facts for Trinidad Plaintiffs and Attorney-Agent defendants. Review state actor requirements and theories of conspiracy referenced in complaint for future Motion to Dismiss	4.00	\$ 360.00
2/2/2008	Phyllis Ain	Exp.	Review pleadings in Civil Action 97-0073 to develop factual record; review cases addressing requirement for pre-filing injunction; review cases law addressing whether resjudicata defense should be raised as an answer under Rule 8© or whether it can be raised by Rule 12; review exceptions to res-judicata application; write res judicata argument.	5.00	\$ 450.00
2/3/2008	Phyllis Ain	Exp.	Revise Memorandum; complete final argument calling for imposition of pre-filing injunction.	4.00	\$ 360.00
2/5/2008	Phyllis Ain	Exp.	Draft Statement of facts for Mafnas and Alexander. Review requirements of and distinctions between judicial sales and execution sales to rebut Pangelinan attempt to challenge sale of Papago Property on these grounds. Review elements of claim for retaliatory criminal prosecution in response to the assertion of First Amendment Right.	5.00	\$ 450.00
2/6/2008	Phyllis Ain	Exp.	Review pleadings and docket sheets to inset record cites. Draft Argument dismissing claim for retaliatory prosecution; research claim for retaliatory denial of due process of law.	4.00	\$ 360.00
3/1/2008	Phyllis Ain	Exp.	Review Oppositions to Motion to Dismiss; outline arguments; draft replies.	4.00	\$ 360.00
3/5/2008	Phyllis Ain	Exp	Westlaw research concerning availability of declaratory relief when issues are barred by res judicata and/or collateral estoppel; review Harmon to refute Pangelinan parallel argument; review case cited by Pangelinan in support of retaliatory due process argument. Revise replies.	2.00	\$ 180.00
			TOTAL HOURS AND AMOUNT BY PARALEGAL	28.00	\$ 2,520.00

EXHIBIT

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